

Rocky Flats Cleanup Commission

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AIR QUALITY ASSESSMENT FOR INCLUSION IN TAG COMMENTS

AT PUBLIC HEARING ON HILLSIDE 881

NOVEMBER 6, 1989

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The air quality aspects of the Hillside 881 remedial action appear to need additional controls and mitigation. Two areas of air emissions have not been adequately addressed: 1) the possible emissions from the liquid cleaning techniques, and 2) the particulate and volatile emissions from earth moving activities.

In the cleaning of the ground water, the various methods described do not include the possibility of plutonium emissions since the drilling has not detected significant quantities of this metal. However, this metal may not migrate with the ground water if it attaches itself to soil particulates. This could also account for the small amounts detected in the sampled water. When remedial activities start, the amount, pressure and chemical composition of the liquid passing through the soil as part of the in-situ cleaning process could capture the plutonium, bring it to the surface, and produce measurable quantities in the processed water. A design for accommodating this possibility needs to be included in the program. Otherwise the plutonium could be released into the atmosphere (perhaps undetected) since no provisions were made for its presence.

The possibility exists that a source of air borne plutonium from the area is due to reflation from the soil. It could be that some of this plutonium is from the 903 pad, however, the highest measurements are east and southeast of 881. Disruption of the ground for mitigation could release the plutonium contaminated soil into the air. There is no mention in the plan for mitigation of this possibility. A very thorough dust control plan needs to be established - even to the degree of enclosing the earth moving activities. Many techniques have been established for asbestos control to the environment; surely this plutonium remedial action could adopt some of these techniques.

W. Sale Biggs

ADMIN RECORD

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